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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

GUOLIANG MA, ELIZABETH PEGUERO, SHARON MANIER, and KIN FAI LAU, on behalf of themselves and others similarly

on behalf of themselves and others similarly

situated,

16-cv-7102 (JMA)(SIL)

Azrack, J.

Plaintiffs,

inst

-against-

HARMLESS HARVEST, INC.,

Defendant.

PLAINTIFFS' NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Named Plaintiffs Guoliang Ma, Elizabeth Peguero, Sharon Manier and Kin Fai Lau, the Class representatives, hereby give notice of moving the Court for entry of an Order of Final Settlement Approval pursuant to Federal Rule of Civil Procedure 23(e). The motion shall be called up for hearing on November 3, 2017 at 1:00 p.m. before this Court and the Honorable Joan M. Azrack, U.S.D.J., Courtroom 6E, 225 Cadman Plaza East, Brooklyn, New York 11201.

In support of this motion, Plaintiffs rely upon: (a) the record herein; (b) the Stipulation of Settlement and Exhibits thereto; (c) the accompanying Memorandum of Law in Support of the Motion for Final Approval of Class Action Settlement; (d) the previously filed Motion for Approval of Attorneys' Fees, Service Fees and Reimbursement of Expenses (ECF Dkt Nos. 14-16) and (e) Plaintiffs' Memorandum in Opposition to the Objections of Anna St. John and Jason Bowerman.

WHEREFORE, for the reasons stated in the instant Motion and accompanying documents, Plaintiffs respectfully request that the Court enter their [Proposed] Final Judgment

and Order of Dismissal With Prejudice, attached as Exhibit B to the Declaration of C.K. Lee in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement.

Respectfully submitted this 20th day of October, 2017

LEE LITIGATION GROUP, PLLC

By: /s/C.K. Lee

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